

## RE: Convergen: Outstanding Items

Benjamin D. LaFrombois <blafrombois@vonbriesen.com>

Fri 8/7/2020 4:25 PM

To: Dov B. Gold <dgold@seidenlegal.com>

Cc: Michael Stolper <mstolper@seidenlegal.com>

Dov,

Your email did not address the euroenergybiosgas.com domain account. It is currently registered with godaddy.

The account is paid through May 2021. In the event Libra desires for this domain to be retained it must cooperate to have it transferred. If Libra desires to relinquish the domain, then it will expire next year. Convergen Energy WI LLC will not be renewing the registration.

Hardware: Please advise where to send the encrypted hard drives.

We will follow-up on the other items as we are still reviewing.

**Benjamin D. LaFrombois | von Briesen & Roper, s.c.**

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**From:** Dov B. Gold <dgold@seidenlegal.com>

**Sent:** Thursday, August 6, 2020 10:16 PM

**To:** Benjamin D. LaFrombois <blafrombois@vonbriesen.com>

**Cc:** Michael Stolper <mstolper@seidenlegal.com>

**Subject:** [EXTERNAL] Convergen: Outstanding Items

Ben,

Please see below regarding outstanding items.

**Mikkelson & Hansen Hardware** - Merely recovering deleted emails is not sufficient; all data must be recovered and sorted similar to the Convergen emails. A forensic review is also required to assess whether the data was copied elsewhere as already demonstrated by our forensic review of Brooks' Libra laptop. Finally, we have not received the encrypted imaged drives of Hansen and Mikkelson that you said you would send.

**Backup of Convergen Emails** - Please confirm this backup included all accounts with the Convergen domain.

**Production of Convergen Emails Pre-sale** - What is the update? Your last update on July 8 was that 55,000 are marked for further review.

**Interrogatories** - The response to Interrogatory 4A is unresponsive and refers to CE LLC's relationship with L'Anse. Clark Kent's affiliation with Brooks is in the past tense. It is not made clear whether Clark Kent and Javier Busto are currently lenders to CE, CEW, or both.

Please confirm that you were not able identify any contingent interests in CEW and any entities in the chain of ownership of CEW. This would include convertible loans, warrants, options or other financial interests.

**Document Requests** - What custodians did you search? Our requests concerning Trade Secrets and Confidential Information to Ms. Brooks (a non-party) survived a motion to quash. We request that you re-consider the limited approach you have taken in responding to this request.

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